

June 8, 2004

David Brandwene  
Senior Toxicologist  
Akzo Nobel Chemicals Inc.  
5 Livingstone Avenue  
Dobbs Ferry, New York 10522

Dear Dr. Brandwene:

The Office of Pollution Prevention and Toxics is transmitting EPA's comments on the robust summaries and test plan for Fyrol 6 posted on the ChemRTK HPV Challenge Program Web site on February 10, 2004. I commend Akzo Nobel for its commitment to the HPV Challenge Program.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

EPA has reviewed this submission and has reached the following conclusions:

1. Physicochemical Properties and Environmental Fate. EPA agrees with the test plan for these endpoints.
2. Health Effects. Adequate data are available for the acute and genetic toxicity endpoints for the purposes of the HPV Challenge Program. The submitter proposed OECD TG 421 for the reproductive/developmental endpoints. However, EPA recommends OECD TG 422 due to excess mortality at all dose levels in the repeated-dose toxicity study which compromises the adequacy of the study.
3. Ecological Effects. EPA agrees that testing is needed for daphnia and algae. However, EPA reserves judgement on the adequacy of the acute fish toxicity data pending additional details in the robust summary.

EPA will post this letter on the HPV Challenge Web site within the next few days. We ask that Akzo Nobel advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission. Please send any electronic revisions or comments to the following e-mail addresses: [oppt.ncic@epa.gov](mailto:oppt.ncic@epa.gov) and [chem.rtk@epa.gov](mailto:chem.rtk@epa.gov).

If you have any questions about this response, please contact Richard Hefter, Chief of the HPV Chemicals Branch, at 202-564-7649. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at [tsca-hotline@epa.gov](mailto:tsca-hotline@epa.gov).

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

-S-

Oscar Hernandez, Director  
Risk Assessment Division

Enclosure

cc: W. Penberthy  
M. E. Weber